



MITIGATED DETERMINATION OF NONSIGNIFICANCE (MDNS)

Greenline Warehouse "A"

File No: 16-102948-SE

Description of

Proposal: Construction of a 45-foot-tall, 225,950 square-foot general commodity warehouse with 287 parking spaces (257 vehicle and 30 trailer), and associated site work, including wetland fill, on a 15.46 acre site (parcel 6142600005). A stormwater pond and associated site work, including wetland fill, is proposed on the adjacent 16.85 acre parcel to the south (parcel 6142600200).

Proponent: Federal Way Campus LLC
11100 Santa Monica Blvd, Suite 850
Los Angeles, CA 90025

Location: 337XX Weyerhaeuser Way South, Federal Way, WA

Lead Agency: City of Federal Way

City Staff

Contact: Senior Planner Stacey Welsh, 253-835-2634, stacey.welsh@cityoffederalway.com

The Responsible Official of the City of Federal Way hereby makes the following decision based upon impacts identified in the environmental checklist, *Federal Way Comprehensive Plan, Staff Evaluation for Environmental Checklist*, and other municipal policies, plans, rules, and regulations designated as a basis for exercise of substantive authority under the *Washington State Environmental Policy Act Rules* pursuant to RCW 43.31C.060.

The lead agency has determined that this proposal will not have a probable significant adverse impact on the environment. Pursuant to WAC 197-11-350(3), the proposal has been clarified, changed, and conditioned to include necessary mitigation measures to avoid, minimize, or compensate for probable significant impacts. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). The necessary mitigation measures are listed below. This decision was made after review of a completed environmental checklist (enclosed) and other information on file with the lead agency. This information is available to the public on request.

This determination is based on the following findings and conclusions:

FINDINGS OF FACT

1. The Greenline Warehouse “A” project is for construction of a 45-foot-tall, 225,950 square-foot general commodity warehouse with 287 parking spaces (257 vehicle and 30 trailer), and associated site work, including wetland fill, on a 15.46 acre site (parcel 6142600005). A stormwater pond and associated site work, including wetland fill, is proposed on the adjacent 16.85 acre parcel to the south (parcel 6142600200) and is part of the proposed action.
2. The proposal is subject to the provisions of the 1994 Weyerhaeuser Company Concomitant Pre-Annexation Development Agreement (CZA) and zoning regulations in effect on August 23, 1994 (*Federal Way City Code* [FWCC]). Any procedural requirements must meet current code (*Federal Way Revised Code* [FWRC]). Zoning for the subject property is Corporate Park (CP-1). Warehousing and distribution and corporate offices are permitted uses in the CP-1 zone pursuant to CZA Exhibit C, Section VII, “Permitted Uses on Those Portions of the CP-1 Zoned Property Lying Outside the Managed Forest Buffer.” The *Federal Way Comprehensive Plan* (FWCP) designation for the subject property is Corporate Park.
3. The applicant submitted an air quality report prepared by Ramboll Environ, revised March 2018. The report describes sources of air pollution typical of a general commodities warehouse, including emergency generators and vehicles used by employee commuter trips and truck deliveries. The report states, “With implementation of required measures to provide reasonable controls of dust and odors, construction of the proposed project would not be expected to result in significant air quality impacts.” Regarding operation of the project, the report states, “The analyses described above indicate the proposed project would be unlikely to result in any significant adverse air quality impacts. Consequently, no operational mitigation measures are warranted or proposed.”
4. The applicant submitted a noise report prepared by Ramboll Environ, revised March 2018. The report concluded, “The assessment found that noise associated with the proposed Project would result in negligible to very minor increases in ambient noise and would be within compliance of all applicable noise limits.” The report lists measures to reduce the potential for high levels of noise from construction equipment or activities. Regarding operation of the project, the report states, “Noise mitigation measures are not warranted at this time.”
5. The applicant submitted a traffic study, *IRG Greenline Buildings A and B Federal Way, WA Transportation Impact Study*, TENW Transportation Engineering NorthWest, March 6, 2018. The traffic study stated that all truck trips are expected to utilize the primary driveway on Weyerhaeuser Way South and all truck trips will be traveling to and from the south using the Weyerhaeuser Way South/SR-18 interchange and therefore, study mitigation or improvements were not required for other road segments. The traffic study does not however, demonstrate how the applicant will prevent trucks entering or exiting the facility from allowing this travel. Without adequate supporting documentation/planning, there is nothing prohibiting trucks from utilizing South 320th Street/SR-5 interchange, South 336th Street, and Weyerhaeuser Way South as an alternate route to the site. Based on the above, the applicant has not demonstrated mitigation of additional truck traffic onto non-designated truck routes such as Weyerhaeuser Way South north of the site, including impacts to the pavement.
6. The applicant submitted a pavement analysis for Weyerhaeuser Way South, *Geotechnical Engineering Services Report Weyerhaeuser Way South, 320th Street to SR 18 Weyerhaeuser Campus Property Federal Way, Washington*, GeoEngineers, August 29, 2017. Per the pavement analysis, the development is expected to nearly triple the loading on the existing pavement (EASLs) along the truck route on Weyerhaeuser Way South. Furthermore, the pavement in the project area is

approaching the end of its useable life. The Public Works Street Division reviewed the pavement analysis and determined that the existing pavement on Weyerhaeuser Way South along the truck route must be fully reconstructed (subgrade soils and new pavement) to accommodate the expected truck traffic load.

7. The project requires review under Process III, *Project Approval*. The Director of Community Development makes a written decision on the application based on the criteria listed under FWRC 19.65.100. A city staff report will be prepared for the project decision that will address additional topic areas.
8. *Cumulative Impacts Analysis* – Greenline Warehouse “A” is proposed on two adjacent parcels (6142600005 and 6142600200). A separate project, Greenline Warehouse “B” was submitted in September 2017 for parcel 6142600200. The city evaluated the projects for cumulative impacts on Warehouse “A” and identified and analyzed those parts of the projects that implicate such impacts in this determination. The two warehouse projects will utilize a common driveway access off of Weyerhaeuser Way. In addition, for both projects there are additional access points proposed off of the private Loop Road. Both projects will utilize the same stormwater pond on parcel 6142600200, although the addition of Warehouse “B” will require the pond to be enlarged from its size if it only served Warehouse “A.” The analysis of these cumulative impacts for Greenline Warehouse “A” are reflected throughout this determination. There are no other cumulative impacts on the Greenline Warehouse “A” project. The city has not received indication from the applicant that the two warehouse projects will be constructed simultaneously; therefore, there is no cumulative impacts analysis regarding construction.

With regard to a cumulative impacts analysis for both warehouse projects, many of the project submittal documents for Greenline Warehouse “A” reference Greenline Warehouse “B.” In particular, the traffic study, IRG Greenline Buildings A and B Federal Way, WA Transportation Impact Study, TENW Transportation Engineering NorthWest, March 6, 2018, addresses both projects. In addition, regarding WAC 197-11-060(3)(b), Greenline Warehouse “A” can proceed without Greenline Warehouse “B” and is not reliant upon Greenline Warehouse “B” taking place in order to proceed. Greenline Warehouse “A” does not depend on Greenline Warehouse “B” as justification for its implementation and the projects are not interdependent parts of a larger proposal. In other words, Greenline Warehouse “A” and Greenline Warehouse “B” do not meet the WAC 197-11-060(3)(b) threshold to require evaluation of the two projects in the same environmental document.

Another separate project, the Greenline Business Park (GBP), was submitted in November 2017. The GBP is proposed on other parcels within the former Weyerhaeuser Campus. The GBP does not propose to share a common parcel, access point, or utility facilities with Greenline Warehouses “A” or “B.” Regarding WAC 197-11-060(3)(b), Greenline Warehouses “A” and “B” can proceed without the GBP and are not reliant upon the GBP taking place in order to proceed themselves. Greenline Warehouses “A” and “B” are not interdependent parts of the GBP and do not depend on the GBP as justification for their implementation. The GBP does not meet the WAC 197-11-060(3)(b) threshold to require the evaluation of the other projects in the same environmental document.

9. The “Staff Evaluation for Environmental Checklist, File No. 16-102948-SE” is hereby incorporated by reference as though set forth in full.

CONCLUSIONS OF LAW

Federal Way’s comprehensive plan policies contained within the FWCP, serve as a basis for the exercise of substantive SEPA authority to approve, condition, or deny proposed actions applicable to potential adverse

environmental impacts resulting from this project. The following components of the FWCP (revised 2015) support the conditions for the development.

NEP10 The City may continue to require environmental studies by qualified professionals to assess the impact and recommend appropriate mitigation of proposed development on environmentally critical areas and areas that may be contaminated or development that may potentially cause contamination.

NEP86 Support state and federal air quality standards and the regulation of activities that emit air pollutants.

NEP87 Utilize building design, construction, and technology techniques to mitigate the negative effects of air pollution on indoor air quality for uses near sources of pollution such as Interstate-5.

NEP102 The City will evaluate potential noise impacts associated with non-residential uses and activities located in residential areas as part of the site plan review process.

TP1.11 Develop code requirements and a designated truck route system that accommodates the needs of the private sector and residents, and provides a balance between movement needs and quality of life.

TP1.12 Discourage the use of road facilities by vehicles carrying hazardous materials and those with weight, size, or other characteristics that would be injurious to people and property in the City.

TP3.15 Develop access management standards to minimize the number of curb cuts on arterials to improve pedestrian and vehicle safety.

TP3.18 Incorporate environmental factors into transportation decision-making, including attention to human health and safety.

SEPA CONDITIONS

Based on the above policy, the following mitigation measures are required to minimize identified potential significant adverse environmental impacts.

- 1) Prior to building permit issuance, the applicant shall submit an evaluation of the facility design by a qualified professional to ensure that the equipment to be installed at the warehouse, as well as warehouse activities, are consistent or similar to those identified in the noise report (*Greenline Building "A" Development, Federal Way Washington Environmental Noise Report, Ramboll Environ, revised March 2018*).
- 2) The following measures shall be implemented during project construction with quarterly reports submitted by the applicant to the city documenting compliance starting from the issuance of the building permit and concluding at issuance of Certificate of Occupancy:
 - a) All equipment shall be fitted with properly sized mufflers, and if necessary, engine intake silencers.
 - b) All equipment shall be in good working order.
 - c) Use quieter construction equipment models if available and whenever possible use pneumatic tools rather than diesel or gas-powered tools.
 - d) Place portable stationary equipment as far as possible from existing residential and noise-sensitive commercial areas, and if necessary, place temporary barriers around stationary equipment.

- e) For mobile equipment that routinely operate near residential areas (i.e., within approximately 200 feet to the north of the project site), consider placement of typical fixed pure-tone backup alarms with ambient-sensing and/or broadband backup alarms.
- 3) A detailed review of final operating conditions shall be completed to ensure that the noise study accurately and conservatively reflects future project operation. A report documenting the assessment shall be submitted to the city six months after the Certificate of Occupancy is issued.
 - 4) If the proposed use of the building includes cold storage, processing, or manufacturing, the air quality analysis (*Greenline Building "A" Development, Federal Way Washington Air Quality Report*, Ramboll Environ, revised March 2018) must be revised and SEPA threshold determination revisited prior to building permit issuance, or if no building permit is required, then prior to business license issuance.
 - 5) The following measures shall be implemented during project construction with quarterly reports submitted by the applicant to the city documenting compliance starting from the issuance of the building permit and concluding at issuance of the Certificate of Occupancy:
 - a) Use only equipment and trucks that are maintained in optimal operational condition.
 - b) Require all off road equipment to be retrofit with emission reduction equipment (i.e., require participation in Puget Sound region Diesel Solutions by project sponsors and contractors), including particulate matter traps and oxidation catalysts to reduce MSATs.
 - c) Use biodiesel or other lower-emission fuels for vehicles and equipment.
 - d) Use carpooling or other trip reduction strategies for construction workers when possible.
 - e) Stage construction to minimize overall transportation system congestion and delays to reduce regional emissions of pollutants during construction.
 - f) Implement restrictions on construction truck idling (e.g., limit idling to a maximum of five minutes).
 - g) Locate construction equipment away from sensitive receptors, such as fresh air intakes to buildings, air conditioners, and sensitive populations.
 - h) Locate construction staging zones where diesel emissions won't be noticeable to the public or near sensitive populations, such as the elderly and the young.
 - i) Spray exposed soil with water or other suppressant to reduce emissions of PM₁₀ and deposition of particulate matter.
 - j) Pave or use gravel on staging areas and roads that would be exposed for long periods.
 - k) Cover all trucks transporting materials, wet materials in trucks, or provide adequate freeboard (space from the top of the material to the top of the truck bed), to reduce PM₁₀ emissions and deposition during transport.
 - l) Provide wheel washers to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of particulate matter on area roadways.
 - m) Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust; sweep and wash streets continuously to reduce emissions.
 - n) Cover dirt, gravel, and debris piles as needed to reduce dust and wind-blown debris.
 - o) Route and schedule construction trucks to reduce delays to traffic during peak travel times to reduce air quality impacts caused by a reduction in traffic speeds.

- 6) Prior to issuance of the Certificate of Occupancy, the applicant shall construct a northbound left-turn lane on Weyerhaeuser Way South at the southerly driveway (truck access) to provide safer and more efficient access into the site. The northbound left (NBL) turn lane storage shall be designed to accommodate the 95th Percentile queues length ensuring left turn queues will not block through traffic lane. The channelization plan must be reviewed and approved by the city and WSDOT.
- 7) Prior to building permit issuance, the applicant shall install weight limit signs on Weyerhaeuser Way South from South 320th Street to the project driveway, and South 336th Street from 20th Avenue South to Weyerhaeuser Way South.
- 8) The applicant submitted a traffic study, *IRG Greenline Buildings A and B Federal Way, WA Transportation Impact Study*, TENW Transportation Engineering NorthWest, March 6, 2018. The development is estimated to generate 994 daily trips consisting of 795 passenger vehicle trips and 199 truck trips. These trips will be served by two driveways (private loop road driveway north of the site and truck access driveway next to SR 18) on Weyerhaeuser Way South. According to the traffic study, all truck trips would utilize the proposed truck access driveway on Weyerhaeuser Way South and will be traveling to and from the south using the Weyerhaeuser Way South/SR-18 interchange. On a daily basis, I-5 southbound congestion routinely occurs between SR 18 and South 320th Street interchange. In order to avoid traffic congestion and reduce travel time due to shorter distance, truck trips with origin and destination from the north could utilize South 320th Street/SR-5 interchange, South 336th Street, and Weyerhaeuser Way South as an alternate route to the site. The traffic study has not demonstrated how the applicant will prevent this alternative truck route (South 320th Street /SR-5 interchange, South 336th Street, and Weyerhaeuser Way South) to the site. Weyerhaeuser Way South from South 320th Street and SR 18 is not a designated truck route and therefore, the roadway cannot support heavy vehicle weights. In general, heavier vehicles cause more damaged to the road than light vehicles. The federal government estimated that an 18-wheel truck causes the same damage to the road as 9,600 cars. Based on the above, the applicant has not demonstrated mitigation of additional truck traffic onto non-designated truck routes such as Weyerhaeuser Way South north of the site, including impacts to the pavement.

As such, prior to the Certificate of Occupancy issuance, the applicant shall provide a fully executed bond for 120 percent of the engineer's estimate for design and construction costs to upgrade the existing pavement on Weyerhaeuser Way South, from the proposed truck entrance to South 320th Street. The bond term shall be for a period of three years from the time of notification by the applicant of full occupancy and use of the facility, unless a shorter term is mutually agreed to in the implementation agreement discussed below. The applicant shall provide the engineer's estimate.

Should the truck trips generated by the project traveling north of the site (to or from the site) exceed 28 truck trips per week as set forth in the implementation agreement discussed below, the city will use the bond for design and construction costs to upgrade the existing pavement on Weyerhaeuser Way South, from the proposed truck entrance to South 320th Street, and/or from the proposed truck entrance to SR-99 via South 336th Street, to the city's required design standards. In the alternative, the applicant may choose to design and construct the implicated roadway(s) identified by the city. For the purposes of this condition, a "truck" shall mean a vehicle rated in excess of 30,000 pounds gross weight as discussed in Chapter 8.40 FWRC.

Prior to building permit issuance, the applicant and the city shall enter into an implementation agreement to set forth the conditions by which the city will monitor the truck trips; how the city will make its determination that the applicant has exceeded the 28 or more truck trips per week; how notice will be provided to the applicant; the cure period for the applicant to remedy the excess truck trips described in the above condition; when the city will call the bond or require the applicant to construct the implicated roadways; the bond conditions; and all other requirements deemed necessary by the city.

- 9) The existing pavement on Weyerhaeuser Way South, south of the site, from the proposed truck entrance to the SR-18 interchange must be fully reconstructed (subgrade soils and new pavement) to accommodate the expected truck traffic load. The applicant shall provide pavement design for city review and approval prior to engineering plans submittal. Once the pavement design is approved by the city, the development shall perform full depth reconstruction of the roadway segment impacted by the truck traffic.

This MDNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date of issuance. Comments must be submitted by 5:00 p.m. on **November 9, 2018**. Email comments should be directed to planning@cityoffederalway.com.

Unless modified by the city, this determination will become final following the above comment deadline. Any person aggrieved of the city's final determination may file an appeal. Anyone may appeal this determination to the Federal Way City Clerk (address below), no later than 5:00 p.m. on **November 30, 2018**, by a written letter stating the reason for the appeal of the determination along with the required appeal fee. You should be prepared to make specific factual objections. All appeals shall contain a specific statement of reasons why the decision of the responsible official is alleged to be in error.

Responsible Official: Brian Davis
Position/Title: Community Development Director
Address: 33325 8th Avenue South, Federal Way, WA 98003
Contact: 253-835-2633, brian.davis@cityoffederalway.com

Date Issued: October 26, 2018

Signature: _____

